

File

## Jump, Christine

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**From:** Akhter Hossain <ahossain@kdheks.gov>  
**Sent:** Tuesday, August 19, 2014 12:50 PM  
**To:** 'SMITH, MARTIN L'; 'STEWART, LON R'  
**Cc:** 'longshore.lin@cleanharbors.com'; Jump, Christine; Mostafa Kamal  
**Subject:** Bldg. B rinse samples and shallow soil samples; Bldg. J Closure

### Building B

Martin,

KDHE reviewed the rinse water samples from building B. The facility collected first round of samples on January 28, 2014. Sampling results didn't meet the clean-up requirements; facility again washed and collected samples on February 18, 2014. Clean Harbor also submitted shallow soil sampling results, crack diagram in Bldg. B, crack survey photos in Bldg. B, and Bldg. B decontamination summary, etc. KDHE reviewed the entire document and found that the documents to be incomplete. Following discussions with Cameron-Cole (facility consultant) KDHE decided to visit the site. We visited the facility on August 5, 2014 and looked at Bldg. B activities with the site oversight engineer and met with you and the facility consultants. After reviewing all activities and site visit, KDHE has the following comments:

- There has not been any additional work done in Bldg. B after February 18, 2014. Clean Harbor **waited approximately 5 months** to submit the report for KDHE's approval on July 11, 2014. Given the tight schedule of December 2014 closure date, this delay was unusually long and didn't provide KDHE adequate time for response. Please submit the project reports ASAP or in a timely manner so that KDHE can review it and provide comments.
- Certification statement missing: Clean Harbor is required to submit the certification statement with any report as per 270.11 (d).
- Oversight engineer was unable to locate where the submitted pictures were taken. Please include sufficient detail when submitting photos to substantiate certain tasks are completed. Clean Harbor could not identify the location of shallow soil samples (main reason for my visit) – based on which decision will be made whether the building floors (with lot of cracks) are suitable for re-use as a backfill at the site.
- Per my conversation with the site Engineer, shallow soils samples were collected on October 17, 2013 (before his time); however, there is a statement in the letter "A stamped and signed certification verifying that the sampling effort was observed and overseen by a Kansas Professional Engineer in also provided". Please make sure the appropriate PE certification is included with the submitted reports.
- All constituents required in the sampling and analysis plan (as part of the closure plan) approved on Oct. 2013 were not analyzed for the shallow soil samples. Since Bldg. B has lot of cracks and needed cleaning two times, number of shallow subsurface soils should be adequate to indicate the absence of soil contamination below the concrete, since the clean concrete is planned for reuse. You are also required to collect additional samples along the cracks.
- Please respond to my comments (by letting me know the status of Building B and your plan of action) by September 2, 2014.

RCRA



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## Building J Closure

Lon,

KDHE received your letter dated August 4, 2014 informing us about Clean Harbor's intention of final closure on Building J. We had a telephone conversation on August 11. You informed me that there should be a big hole in the Bldg. J. KDHE visited the facility and found that the hole is already filled in with river sand. Regarding the closure of Building J, KDHE has the following comments:

- Did Clean Harbor determine the vertical and horizontal extent of contamination in and around Building J?
- Did Clean Harbor collect sufficient subsurface soil samples to determine the vertical and horizontal extent of contamination? Clean Harbor is required to show clean closure is achieved with no contamination remaining underneath the building.
- Clean harbor must perform soil analysis for all the constituents in the work plan/sampling and analysis plan (which is a part of the closure plan) approved by KDHE on October 10, 2013. (Few other constituents were also added later).
- If Clean Harbor has already performed all the above activities, please submit the findings in details with maps showing the depths, locations of samples and summary of soil analytical results performed by a Kansas Certified laboratory. KDHE will review the results and provide comments regarding the soils underneath the building J. If Clean Harbor wait for the replacement of the floor, pressure washing the ceiling and walls and collect rinse samples and analyses of the samples and then submit to KDHE, it may be too late if any soil contamination is found in KDHE's review and sufficient samples were not taken to prove that no contamination is present in the soil. At that point of time, Clean Harbor might have to drill through the replaced concrete again. KDHE also doesn't want facility to do that.
- Clean Harbor can submit the electronic copy and forward the hardcopy by mail.
- If you find the above tasks were not completed as planned, please complete the task and forward your finding for KDHE's approval.
- Please respond to my comments (by letting me know the status of Bldg. J and your plan of action) by September 2, 2014.

Akhter Hossain; P.E

KDHE/BWM